

NOTICE OF OBJECTION TO CONFIRMATION

JPMORGAN CHASE BANK, NATIONAL ASSOCIATION has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

1. File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

2. Attend the hearing scheduled to be held on 04/25/2018 in the TRENTON Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: April 16, 2018

/s/ Sherri J. Braunstein
Sherri J. Braunstein, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Tel: 856-813-5500 Ext. 47923
Fax: 856-813-5501
Email: sherri.Braunstein@phelanhallinan.com

File No. 807740

Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road
Mt. Laurel, NJ 08054
856-813-5500
FAX Number 856-813-5501
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION

In Re:
Pauline B Buckley A/K/A
Pauline Buckley

Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

Chapter 13

Case No. 18-10310 - KCF

Hearing Date: 04/25/2018

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor,
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, the holder of a Mortgage on debtors residence
located at 1013 ETON WAY, NEPTUNE, NJ 07753 hereby objects to the Confirmation of the debtors
proposed Chapter 13 Plan on the following grounds:

1. On March 16, 2018, Movant filed a Proof of Claim listing pre-petition arrears in the amount of \$63,255.31.
2. Debtors' Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
3. Debtors' Plan currently provides for payment to Movant in the amount of \$1,144.48 only.
4. Movant objects to Debtors' Plan as it is underfunded. Debtors' Plan should be amended.

WHEREFORE, JPMORGAN CHASE BANK, NATIONAL ASSOCIATION respectfully requests
that the Confirmation of Debtors Plan be denied.

/s/ Sherri J. Braunstein
Sherri J. Braunstein, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Tel: 856-813-5500 Ext. 47923
Fax: 856-813-5501
Email: sherri.Braunstein@phelanhallinan.com

Dated: April 16, 2018

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

807740
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
856-813-5500
Attorneys for JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION

| | |
|--|----------------------------|
| In Re: | Case No: 18-10310 - KCF |
| Pauline B Buckley A/K/A Pauline Buckley | Hearing Date: _____ |
| | Judge: KATHRYN C. FERGUSON |
| | Chapter: 13 |

CERTIFICATION OF SERVICE

1. I, MIGUEL ZAVALA:

represent the _____ in the above-captioned matter.

am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents JPMORGAN CHASE BANK, NATIONAL ASSOCIATION in the above captioned matter.

am the _____ in the above case and am representing myself.

2. On April 16, 2018 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: April 16, 2018

/s/ MIGUEL ZAVALA
MIGUEL ZAVALA

| Name and Address of Party Served | Relationship of Party to the Case | Mode of Service |
|---|-----------------------------------|--|
| Pauline B Buckley 1013 Eton Way Neptune, NJ 07753 | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ <small>(as authorized by the court *)</small> |
| WILLIAM BUCKLEY 1013 ETON WAY NEPTUNE, NJ 07753 | Co-Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ <small>(as authorized by the court *)</small> |
| DACETA BLOOMFIELD 1013 ETON WAY NEPTUNE, NJ 07753 | Co-Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ <small>(as authorized by the court *)</small> |
| Mark A. Steinberg 2300 State Highway 66 PO Box 925 Neptune, NJ 07754 | Debtor's Attorney | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ <small>(as authorized by the court *)</small> |
| | | |

| | | |
|--|--------------|---|
| Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853 | Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |
| U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102 | U.S. Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.